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Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MALINDA SLATON, an individual,

Plaintiff,

vs.

L.L.O. INC., d/b/a ACME ELECTRIC, a domestic corporation; INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL UNION 357, a domestic not for profit corporation; DOES I through X, inclusive; ROE CORPORATIONS I through X, inclusive.

Defendants.

CASE NO: 2:17-cv-01561-RFB-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTIONS AND FOR
DEFENDANT TO REPLY**

(First Request)

COMES NOW, Plaintiff MALINDA SLATON, (hereinafter, "SLATON"), by and through her attorney of record Trevor J. Hatfield of the law firm of Hatfield & Associates, Ltd., and L.L.O. INC., d/b/a ACME ELECTRIC's (hereinafter "ACME ELECTRIC) and do hereby stipulate and agree to an extension of time for Plaintiff to respond to Defendant's following Motions as follows:

1. Motion for Summary Judgment on Breach of Contract Claim (ECF #51) filed on August 8, 2019 – Response due on August 29, 2019;
2. Motion for Summary Judgment on Title VII Claim (ECF #52) filed on August 9, 2019 – Response due on August 30, 2019;

3. Third Motion for Partial Summary Judgment to Limit Plaintiff's Categories of Damages (ECF #53) filed on August 12, 2019 – Response due on September 2, 2019;
4. Motion to Strike Jury Demand or, in the Alternative, to Bifurcate Liability and Damages Phases of Trial (ECF #54 and ECF #55) filed on August 13, 2019 – Response due on August 27, 2019.

The reason the extension is requested is that Plaintiff's attorney is scheduled for dental surgery on Tuesday, August 27, 2019, and will require one day for recovery. In addition, the Labor Day Holiday weekend is August 31 through September 2, 2019. As responses are required for the Motions, the last one being due on September 2, 2019, the parties have agreed to extend the response time for each of the Motions one week from each of the respective due dates. Defendant's replies to Plaintiff's responses will also be extended by one week respectively.

This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the parties' first request for an extension of the time for the parties to respond to the various motion response deadlines. Accordingly, Plaintiff's proposed response dates and Defendant's proposed reply dates shall be as follows:

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<u>Document Number</u>	<u>Proposed Response Due Date</u>	<u>Proposed Reply Due Date</u>
1. Motion - ECF #51	September 5, 2019	September 26, 2019
2. Motion – ECF #52	September 6, 2019	September 27, 2019
3. Motion – ECF #53	September 10, 2019	September 30, 2019
4. Motion – ECF #54 and ECF #55	September 3, 2019	September 17, 2019

Dated this 27th day of August 2019.

HATFIELD & ASSOCIATES, LTD.

/s/ Trevor J. Hatfield

By: _____

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Attorney for Plaintiff

Dated this 27thth day of August 2019.

HOLLEY DRIGGS, WALCH
FINE WRAY PUZEY & THOMPSON

/s/ F. Thomas Edwards

By: _____

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Attorneys for Defendant L.L.O. Inc. d/b/a Acme
Electric

IT IS SO ORDERED.

RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 28th day of August, 2019.

CERTIFICATE OF SERVICE

I certify that on the 27th day of August 2019, I electronically filed the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTIONS AND FOR DEFENDANT TO REPLY (First Request)** with the Clerk of the Court by using the ECF system.

Dated this 27th day of August 2019.

By: /s/ Freda P. Brazier
An employee of Hatfield & Associates, Ltd.